

In order to be more responsive to community concerns, EPA has established a technical assistance resource who will assist the CAG with interpretation of technical information and respond to questions related to the West Lake Landfill Superfund Site. Many issues raised about the Superfund process and the technical direction of the site can be addressed through this vehicle.

Here are EPA Region 7's responses to the specific requests included in the October 2013 Resolution from the CAG:

There are two phases of pre-construction survey work: the Gamma Cone Penetrometer test (GCPT) and a core sampling phase.

Under the GCPT work plan that EPA reviewed and approved from Republic Services, dust suppression is required. A cover is not required for the equipment or the ground where this survey phase of the isolation barrier project is being conducted, and is not anticipated to be necessary for the core sampling phase.

Construction of such a tent type cover on the site during trench construction is not feasible due to the anticipated size of the trench, site slopes and the need to allow access by heavy equipment. Other dust suppression technologies will be used as necessary. Keep in mind that Republic intends to construct the trench in an area free of radiologically-impacted material (RIM), and the purpose of the pre-construction survey work is to confirm that the proposed trench location does not contain RIM.

During the month of November, the preliminary GCPT pre-construction survey work is planned. All work will be overseen by EPA On-scene Coordinators with the authority to stop work at any time, if warranted.

There are two phases of pre-construction survey work: the Gamma Cone Penetrometer test (GCPT) and a core sampling phase. Construction plans for the trench (isolation barrier) will not be developed until the pre-construction survey work is completed.

As outlined in the Health and Safety Plan, only personnel who are appropriately trained will be allowed to work on the site. Such training and protocols do require workers and oversight personnel to wear dosimeters and appropriate levels of protection.

Since this phase of the work only involves sampling with protocols to minimize dust suppression, no evacuation plan is necessary.

The Missouri Department of Natural Resources will continue to monitor the air for gamma radiation and other contaminants throughout the work, as it has been doing for several months now. MDNR's air monitoring results are posted regularly to their website.

EPA plans to share the results of the GCPT and core sampling investigations with the public. The methods EPA may use to share this information have not yet been determined but may include posting the information to EPA's website and discussing the information at a future public meeting.

As requested by the community, EPA is striving to ensure that the survey phase of work is completed in a safe and timely manner so that construction of the isolation barrier can proceed without delay.

Resolution

WHEREAS within a five mile radius of West Lake Landfill are heavily populated areas including: housing, malls, shops, hospitals, retirement homes, factories, 15 schools, daycare centers, major thoroughfares, and a major waterway that could suffer almost immediate exposure from any airborne contaminants released by trench construction at the West Lake Landfill. If a situation develops that would cause exposure to hazardous materials those living or working in the immediate vicinity will have virtually no notice of danger until after they have been exposed. The potential health, safety, and economic impacts of an unintended large-scale release of hazardous materials could result in severe and devastating impacts to those exposed.

THEREFORE BE IT RESOLVED that the West Lake/Bridgeton Landfill Community Advisory Group does hereby request of the United States Environmental Protection Agency (EPA) that certain specific measures and practices be used during the trench construction at the West Lake Landfill; those measures and practices should include but are not limited to: An EPA representative on site during the trench construction with the authority to: establish new testing and monitoring when needed, coordinate with State, County, and Local Governmental and Emergency authorities, and halt operations if needed; that EPA and MDNR host a public meeting sharing the details of the construction allowing questions from the community; installation of constant air monitoring stations which monitor Alpha, Beta, and Gamma particles and VOCs surrounding the West Lake Landfill and within residential areas within 1 and 1 half miles surrounding the West Lake Landfill; the temporary relocation for the duration of the trench construction of residents and pets in a 1 and 1 half mile radius surrounding the West Lake Landfill and that those properties have protection against theft and vandals; that in the event of off-site contamination compensation is given to property owners and businesses for losses; that no brush-hog or other heavy dust generating equipment be used in the proposed construction area until such time as that area has been tested and it be determined that no radioactive or other hazardous materials will become airborne if such equipment is used; that a temporary shelter be used to cover the trench and the equipment decontamination area to minimize the possibility of known or unknown contaminants from becoming

airborne; that all workers wear dosimeters on their person while at the job-site checked at mid shift and end of shift so exposures may be more quickly detected; that only HAZMAT trained and certified contractors and subcontractors using skilled labor perform construction related to the project; that emergency plans including evacuation be established with State, County, and Local authorities for the 5 mile surrounding area of the West Lake Landfill and shared among all those entities, first responders, and hospitals; and at all times best